

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

**FILED**

August 03, 2022

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

United States of America

v.

GRANT MOSLEY

*Defendant(s)*BY: Fidel Morales  
DEPUTY

Case No.

EP: 22-M-1906-MAT

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

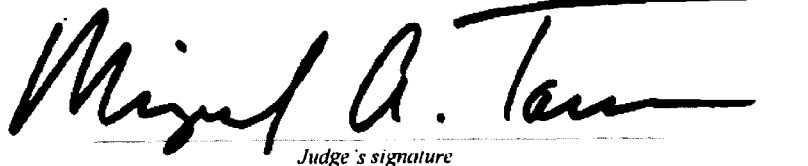
On or about the date(s) of August 2, 2022 in the county of El Paso in the  
Western District of Texas, the defendant(s) violated:*Code Section*Title 18 United States Code,  
Sections 922(o)*Offense Description*Possessing, engaging in the business of importing, manufacturing, or dealing  
in firearms, or in the course of such business to ship, transport, or receive  
any firearm in interstate or foreign commerce.

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.Complaint sworn to telephonically on  
August 03, 2022 at 02:00 PM and signed  
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**  
*Complainant's signature*Gary Bourland, FBI Special Agent  
*Printed name and title*

Sworn to before me and signed in my presence.

Date: 08/03/2022  
*Judge's signature*City and state: El Paso, TXMiguel A. Torres U.S. Magistrate Judge  
*Printed name and title*

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF TEXAS

IN THE MATTER OF THE APPLICATION )  
OF THE UNITED STATES OF AMERICA )  
FOR CRIMINAL COMPLAINT OF ) CASE NO.  
Grant MOSLEY )  
)

**CRIMINAL COMPLAINT**

Your Affiant has been employed as a Special Agent (SA) with the Federal Bureau of Investigation (FBI) since September 17, 2017. Your Affiant is currently assigned to the El Paso Field Office Violent Crimes Safe Street's Task Force. Your Affiant has received five months of academic and practical training at the FBI academy. I also have 23 years of experience as an Infantry Officer with the United States Marines. Your affiant has knowledge of the nomenclature and specifications of weapons systems, specifically pistols, rifles and carbines based on the AR-15 platform. Additionally, during the course of this and other investigations, I have conducted or participated in physical and electronic surveillance, executed search warrants, debriefed informants and reviewed other pertinent records. Through my training, education, experience, and through conversations with other agents and law enforcement officers, I have become familiar with methods used by firearms traffickers to import, transport, safeguard, manufacture and distribute firearms, and the methods used by firearms traffickers to collect, transport, safeguard, remit, and/or launder proceeds.

Your Affiant, is familiar with the facts and circumstances of the investigation through my personal participation; discussions with other agents and personnel from the Bureau of Alcohol, Tobacco Firearms and Explosives (ATF), U.S. Army Criminal Investigation Division (CID), U.S. Postal Inspection Service (USPIS) and other law enforcement agencies; my discussions with witnesses involved in the investigation; and review of records and reports relating to the investigation. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the information was Further your affiant states as follows:

1. On or about May 12, 2022, the Newark, NJ FBI observed a messaging platform channel that advertised what appeared to be Glock full auto switches and AR15 auto sears (also known as "swift links" or drop in auto sears, commonly abbreviated "DIAS") made on a three-dimensional printer as well as computer data files to produce the items.

2. The “switch” replaces the slide cover plate on a Glock handgun and allows the option of semi-automatic (one round fired per pull of the trigger) or fully automatic fire (continuous fire until the trigger is released).
3. Through investigation by the ATF, FBI, CID and USPIS, it was determined the “switch” is being sold illegally on social media platforms. Often buyers will be directed to communicate using a messaging platform.
4. On or about May 22, 2022 through May 28, 2022, a law enforcement officer acting in an undercover capacity, known as an online covert employee (OCE) used the aforementioned messaging platform channel to inquire about the products advertised on that channel.
5. On or about the second week of June 2022, it was observed that the message platform channel was offering Glock switches made of metal. The message platform channel user indicated that he/she was waiting on one part to complete the Switch and they would be available soon.
6. On or about the week of June 12, 2022 through June 18, 2022, OCE contacted the aforementioned user and purchased an AR15 auto sear, herein after referred to as ITEM 1, by making monetary payment to a Cashapp account associated with telephone number ending in 8476. The Cashapp account username associated with this account is “Grant.”
7. Department of Defense Office of the Inspector General confirmed that DEFENDANT Grant Lee MOSLEY, is active military. The last address on record for MOSLEY is on Fort Bliss, TX and his phone number matched the telephone number ending in 8476.
8. On or about the week of June 19, 2022 through June 25, 2022, the package containing ITEM 1 was received by law enforcement officers and its contents were examined, photographed then secured in evidence storage pending laboratory examination. The envelope was a USPS, Priority Mail padded envelope bearing the handwritten return address in El Paso, TX, which is located in the Western District of Texas. The package contained ITEM 1, an AR15 auto sear, which appeared to be made of red plastic filament. ITEM 1 was secured with clear tape in between two pieces of cardboard type material.

9. The USPIS provided information associated with the mailing of the package containing ITEM 1:
  - a) This package was sent on June 14, 2022 using a credit/debit card to pay for all ending in 2374 issued by USAA from the El Paso, Texas post office located at 5249 Sanders Ave, El Paso, TX 79924, located in the Western District of Texas.
10. On or about the week of June 19, 2022 through June 25, 2022, OCE contacted aforementioned user, MOSLEY and inquired about a metal Glock switch. As with the purchase of ITEM 1, OCE transferred monetary payment through Cashapp to the aforementioned Cashapp account as instructed by MOSLEY and purchased a Glock switch, herein after referred to as ITEM 2.
11. On or about the week of June 26, 2022 through July 02, 2022, law enforcement officers received a package containing ITEM 2. The package and its contents were examined, photographed, and secured in evidence storage pending further laboratory examination. The package envelope was a USPS Priority padded envelope that had a handwritten address label with the same return address as ITEM 1, located in the Western District of Texas.
12. The package that contained ITEM 2 was mailed from Deland, FL and was paid for with the same USAA debit/credit card ending in 2374. That same debit/credit card was used at the Deland post office on June 20, 2022, at a self-service kiosk. During that transaction a photo was taken of the customer. The person in said photo appears to be MOSLEY.
13. USPIS provided the customer account information associated with MOSLEY with a phone number ending in 8476, and an address located in Deland, FL.
14. An open-source search of social media for Grant MOSLEY revealed his Facebook account. The account show pictures of him and other members of the military. On June 25, 2022, MOSLEY posts "Who want to help me start my business? I'm taking donations. I have \$500 out of the 3500 needed for startup cost...A gun manufacturing business. The machine I need with all the parts and components is 3500... The machine will allow me to do ar15s, ar10s, p80s, 1911s and ak47s right from the start."
15. USPIS provided package information associated with MOSLEY's customer account. The information shows multiple packages with the return address: Grant MOSLEY 2780

Hyacinth Road, Deland, FL 32724 being shipped to Grant MOSLEY 2780 Hyacinth Road, Deland, FL 32724 from the El Paso, TX post office.

16. Additional review of the messaging channel found multiple videos and photographs of customers unpacking merchandise, including a 38 second video of a customer unpacking a red AR15 auto sear from a padded priority mail envelope, with the same return address located in El Paso, TX.
17. On July 19, 2022, while conducting surveillance on MOSLEY at Fort Bliss, TX, USPIS and CID agents, witnessed MOSLEY walk with two black trash bags with yellow drawstrings. Agents observed MOSLEY walk out of the barracks towards a dumpster near the barracks and saw MOSLEY deposit both trash bags into the dumpster. When agents went to retrieve the black trash bags with yellow draw strings, all other trash bags within the dumpster were white in color. Agents reviewed the contents inside of the two trash bags which included two USPS receipts and two receipts to separate stores inside of Fort Bliss. All four of the receipts indicated items had been paid for with a Visa Debit card ending in 2374.
18. The first USPS receipt indicated a purchase had been made on May 12, 2022 at the Northgate Station in El Paso, TX. The second USPS receipt indicated a purchase had been made on June 13, 2022 at the Contract Postal Unit (CPU) in East Fort Bliss, TX. USPIS agent was able to analyze postal records and found both transactions matching the transaction on the receipts. Records showed the packages had the same return address located in El Paso, matching both ITEM 1 and 2.
19. On July 22, 2022, FBI and CID Agents obtained MOSLEY's fingerprints from the U.S. Army, Ft. Bliss, Texas, Provost Marshal Office. MOSLEY's fingerprints were submitted to the FBI Laboratory for comparison to fingerprints obtained on previous OCE purchases and purchase packaging from MOSLEY.
20. On or about July 27, 2022, the FBI Laboratory identified twelve (12) fingerprints attributed to MOSLEY on materials previously submitted to the laboratory by law enforcement officers. Ten (10) attributed fingerprints were on various packaging materials associated with ITEM 1. Two (2) attributed fingerprints were on various packaging materials associated with ITEM 2.
21. On or about July 27, 2022, ATF, OCE conducted a purchase of five fully automatic sears from the same message channel user, MOSLEY for \$400.

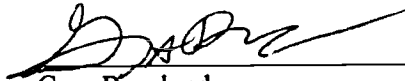
22. On July 30, 2022, ATF, FBI, CID and USPIS Special Agents executed a Federal Search Warrant of MOSLEY's storage unit, #310, in a storage facility located at 8833 Dyer St., El Paso, TX 79904.
23. During the execution of the search warrant, law enforcement agents discovered and seized a 3D printer and 3D printer filaments which are used in 3D printing formed objects, including full auto sears. The recovered 3D printer filaments were consistent with the material of the AR15 auto sear received in ITEM 1.
24. On August 2, 2022, your affiant conducted an interview of MOSLEY. MOSLEY waived his Miranda Rights. MOSLEY admitted that he has previously manufactured drop in automatic sears within the Ft. Bliss Army Barracks in El Paso, TX, which is located in the Western District of Texas. MOSLEY admitted that he used 3D printing to fabricate drop in sears. MOSLEY admitted to selling fully auto switches and fully automatic sears. MOSLEY admitted that the aforementioned messaging channel was his. MOSLEY admitted he used the aforementioned return address located in El Paso, TX. MOSLEY admitted ownership of the property inside of storage unit #310, located at 8833 Dyer St., El Paso, TX 79904. MOSLEY admitted to moving into an apartment with a friend in El Paso, TX, where MOSLEY admitted to having a 1911, .45 caliber pistol, and a Glock pistol which MOSLEY believed had a fully automatic sear installed. MOSLEY believed he had stored additional sears at the address. MOSLEY stated that he had tested the drop in auto sear and the sear worked.

Your affiant is aware that Title 18 United States Code, Section 922, for any person (a) except a licensed importer, licensed manufacturer, or licensed dealer, to engage in the business of importing, manufacturing, or dealing in firearms, or in the course of such business to ship, transport, or receive any firearm in interstate or foreign commerce; or (b) except a licensed importer or licensed manufacturer, to engage in the business of importing or manufacturing ammunition, or in the course of such business, to ship, transport, or receive any ammunition in interstate or foreign commerce; dealing in firearms without being a Federal Firearms Licensee (FFL).

Based on my training and experience, I am aware that Title 26 United States Code, Section 5845(b) defines the term "machinegun" as any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. I am also aware that the term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person. As such, I am aware that an auto sear, and a switch are both parts designed and intended for use in converting a weapon into a machinegun, and are themselves machineguns.

Based on the aforementioned facts and circumstances, your Affiant believes probable cause exists that MOSLEY possessed, engage in the business of importing, manufacturing, or dealing in firearms, or in the course of such business to ship, transport, or receive any firearm in interstate or foreign commerce in violation of Title 18, United States Code, Sections 922(a).

FURTHER THE AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Gary Bourland  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to me this 3rd date of August 2022.

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Miguel A. Torres  
United States Magistrate Judge